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**Not for service*

July 11, 2025

BY ECF

Hon. Lewis J. Liman
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Derwin Gonzalez v. City of New York, et al.*, 25 CV 1452 (LJL)

Your Honor:

I am co-counsel for Plaintiff in the above matter.

I write to ask that the Court extend the July 14, 2025 deadline by which Plaintiff is to file any amended pleadings by one additional week, to July 21, 2025. Defendants consent to this request. There has been one prior application to extend this deadline, from June 30, 2025 to July 14, 2025, which the Court granted.

Plaintiff intends to amend the operative pleading, including to substitute in the true names of the four “Doe” Defendants, which Plaintiff has learned in the course of discovery in this case. Defendants do not consent to the proposed amendments Plaintiff has proposed. However, the parties met and conferred today in order to determine whether we can come to an agreement about any of the proposed amendments, and, after that meeting, Plaintiff agreed to propose another round of amendments. If the Court grants the requested one-week adjournment, Plaintiff will be able to provide Defendants with another proposed amended complaint, meet and confer after Defendants have considered it, and either file an amended pleading on consent, if possible, or make a further application related to amendment.

Plaintiff and Plaintiff’s counsel thank Your Honor for the Court’s attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver